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April 28, 1995

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The Secretary, FCC
Washington, DC 20554

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I am writing in opposition to RM-8626.

FCC MAIL ROOM

I am the principal representative of the Amateur Radio Service to the State of North Carolina Department of Emergency Management. I have been the initial contact on North Carolina's State Emergency Response Team (SERT) call-up roster for over 10 years. I also serve as the RACES Radio Officer for the State of North Carolina.

Implementation of RM-8626 would preclude both the code practice and the bulletin functions of W1AW. Although I feel that the code practice function of W1AW is very important, I shall address only the bulletin functions in my comments.

W1AW is the most reliable and credible source of information immediately and directly available to the Amateur Radio Service. Amateurs in North Carolina operating in support of the North Carolina Department of Emergency Management have used W1AW to advise other Amateurs of emergency operations occurring within North Carolina. We also use W1AW bulletins to find out about emergency operations in other areas so that we can avoid causing interference.

The most recent example of the latter was W1AW's transmission of Bulletin ARLB-042 on April 19, 1995. Through this bulletin, North Carolina Amateurs learned that a notification of a Voluntary Communications Emergency had been issued by the Engineer in Charge at the Dallas, Texas, office of the FCC requesting that Amateurs cooperate by

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relinquishing the use of several frequency bands, including 3.922-3.928 MHz. This was to accommodate Amateur Radio communications in support of recovery efforts after the bombing of the Federal Building in Oklahoma City.

Two North Carolina National Traffic System nets were affected; the North Carolina Morning Net at 7:45 a.m. on 3.927 MHz and The North Carolina Evening Net at 6:30 p.m. on 3.923 MHz. The North Carolina HF ARES (Amateur Radio Emergency Service) net, the Tar Heel Emergency Net at 7:30 p.m. on 3.923 MHz was also affected. All three of these nets became aware of the FCC's request through the ARRL bulletin transmitted on HF by W1AW. All three of these nets moved to frequencies outside the bands requested by the FCC.

Significantly, no one questioned the authenticity of the FCC request because an ARRL bulletin, transmitted on W1AW, was the source of the information. One might also have questioned whether operation on these frequencies, at these times, was likely to cause interference in Oklahoma. This question was not raised by any of the participants of these three nets (all three of which exist to practice for, and assist in emergencies.) They were glad to comply with the FCC request. None of us wanted to take a chance, however remote, that we would cause interference. Nor did we want to even give the appearance that we were operating with disregard of the FCC's request.

During numerous emergency operations we have issued and transmitted North Carolina bulletins on HF to keep Amateurs abreast of the status of the operation. This allowed them to prepare to travel to the disaster area to provide communications assistance. These one way transmissions from the North Carolina Emergency Operations Center would presumably be banned by RM-8626. We have also announced, through W1AW bulletin, that certain frequencies were being used for emergency communications by North Carolina Amateurs. The W1AW bulletins requested that these frequencies be avoided by Amateurs not involved in the operation. We have never, to my knowledge, had to ask the FCC to declare a communications emergency during any of the many North Carolina emergency communications operations.

Although many new modes of communications exist (cellular telephones, various packet technologies, computer networks, etc.), none have yet demonstrated that their reliability, under all possible adverse conditions, justifies abolishing backup communication paths. The State of North Carolina still activates Amateur Radio (ARES/RACES) whenever the State Emergency Response Team is activated. These new communication modes do not make W1AW HF bulletin transmissions obsolete or redundant!

Adapting RM-8626 would deprive both the Amateur Radio Service and the Emergency Management Community of an extremely valuable part of our emergency communications response capabilities, the most reliable and credible source of information immediately and directly available to the Amateur Radio Service, W1AW's HF bulletins.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'W. Reed Whitten', with a long horizontal flourish extending to the right.

W. Reed Whitten, AB4W

State RACES Radio Officer, North Carolina